

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

DOCKET NO. 2017-292-WS

In the Matter of)	
)	
Application of Carolina Water Service,)	
Inc. for an Adjustment of Rates and)	REHEARING REBUTTAL TESTIMONY
Charges and Modifications to Certain)	OF
Terms and Conditions for the Provision of)	MICHAEL CARTIN
Water and Sewer Service)	

1 **Q. PLEASE STATE YOUR NAME, OCCUPATION AND BUSINESS ADDRESS.**

2 **A. My name is Michael R. Cartin. I am the Director of External Affairs and Strategy for**
3 **Carolina Water Service, Inc. ("CWS" or "Company"). My business address is 150 Foster Brothers**
4 **Drive, West Columbia, SC 29172.**

5 **Q. WHAT IS THE PURPOSE OF YOUR REHEARING REBUTTAL TESTIMONY?**

6 **A. To address issues raised in ORS witness Dawn Hipp's testimony in this case.**

7 **Q. DO YOU AGREE WITH MS. HIPPI THAT CWS'S UPDATED SLUDGE HAULING**
8 **COSTS SUPPORT THE ORS' NORMALIZATION ADJUSTMENT?**

9 **A. No, I do not. The Company's sludge hauling costs cannot be viewed in isolation. Even if**
10 **the sludge hauling costs have been lowered since the April 3, 2018 hearing, other expenses, such**
11 **as contract operations, have increased during the same time. Contract Operations has increased**
12 **by \$31,887.50 a month at Friarsgate. The ORS cannot cherry pick some of the Company's updated**
13 **expenses to justify its adjustment. The rate case should be based on the test year.**

14 **Q. SHOULD THE COMMISSION ACCEPT THE ORS'S NORMALIZATION**
15 **ADJUSTMENT BECAUSE CWS WILL NOT INCUR SLUDGE HAULING COSTS**

1 **WHEN THE FRIARSGATE PLANT IS REPLACED BY AN INTERCONNECTION**
2 **WITH THE CITY OF COLUMBIA?**

3 A. No, for several reasons. The interconnection with the City of Columbia is not expected to
4 take place until the first quarter of 2019, at the earliest, and the Interconnection Agreement with
5 the City must be approved before it can take effect. CWS has requested approval of the Satellite
6 Sewer System Agreement in Docket No. 2018-256-S, and ORS has not taken a position on the
7 request at this time. Because ORS Witness Hipp's testimony presumes approval by this
8 Commission of the Interconnection Agreement filed by the Company on August 2, 2018, the
9 Company infers from Ms. Hipp's statements that ORS fully supports the Interconnection
10 Agreement as filed. CWS hopes to obtain this Commission's approval of the Agreement on or
11 before October 1, 2018 after all applicable customer notices have been served. Most important, the
12 elimination of sludge hauling expense due to the interconnection is a change that will occur in the
13 future. The Commission approved rates in this case based on a September 1, 2016 to August 31,
14 2017 test year. As far as I know, the Commission has never set rates based on a future test year.
15 If the Commission should decide to "look forward" as Ms. Hipp urges, it must do so
16 comprehensively, considering all of CWS's predicted expenses, not just a selective reduction in
17 one expense item. While sludge hauling expenses will go away after the interconnection, the
18 Company's purchased sewer expense will be increasing by approximately \$1.2 Million annually.
19 Therefore, if this Commission were to accept ORS' adjustment based off a future interconnection
20 project then the Company would respectfully ask the Commission to approve the increase in
21 purchased sewer expense in rate recovery.

1 Q. MS. HIPPI ASSERTS THAT CWS DID NOT DISPUTE ORS' NORMALIZATION OF
2 WATERGATE SLUDGE HAULING COSTS FOR THE WATERGATE PLAN; IS SHE
3 CORRECT?

4 A. No, she is not. CWS sought and obtained recovery for the combined costs of sludge hauling
5 at the Watergate and Friarsgate wastewater treatment facilities.

6 Q. HOW DO YOU RESPOND TO MS. HIPPI'S ARGUMENT THAT THE RECENT
7 REDUCTION IN THE COMPANY'S SLUDGE HAULING EXPENSES CONFIRMS
8 THAT THE TEST YEAR EXPENSES WERE ABNORMALLY HIGH?

9 A. As I explained in my direct testimony, CWS took affirmative measures to reduce its sludge
10 hauling expenses. Specifically, it rented a sludge press to reduce the volume of sludge being
11 transported. Essentially, Ms. Hipp advocates punishing the company for undertaking measures
12 that increase its operational efficiency.

13 Q. MS. HIPPI TESTIFIED THAT IT IS "PREMATURE FOR THE RATEPAYERS TO
14 BE RESPONSIBLE FOR ANY LITIGATION COSTS" FOR THE RIVERKEEPER SUIT,
15 AND RECOMMENDS THE COMMISSION DENY RECOVERY OF THE EXPENSE FOR
16 THE ACTION. DO YOU AGREE?

17 A. No. I would point out that Ms. Hipp's recommendations regarding the recovery of legal
18 expenses are inconsistent. Ms. Hipp has proposed that CWS's condemnation related expenses and
19 the costs of litigation for the two actions before the Administrative Law Court, should be assigned
20 to a regulatory asset, and that CWS should be permitted to request their recovery later once the
21 outcome is determined. Yet, she advocates total denial of Riverkeeper litigation expenses. If it is
22 indeed premature for CWS to seek recovery of the Riverkeeper expenses, as she testified, it seems
23 those expenses should also be assigned to a regulatory asset for recovery at a later date.

1 Q. CAN YOU EXPLAIN THE DISCREPANCY BETWEEN THE SUMMARY OF
2 LITIGATION EXPENSES CWS PROVIDED IN THE APRIL 3, 2018 HEARING AND
3 THOSE ACCOMPANYING YOUR DIRECT TESTIMONY?

4 A. Yes, at the hearing, we inadvertently characterized \$5,617 of legal fees as related to the I-
5 20 litigation, when they were incurred for the Friarsgate WWTF and regulatory matters. I regret
6 the error. However, I would point out those fees were recoverable operating expenses; they just
7 were not incurred in connection with the I-20 litigation.

8 Q. DID CWS REVISE THE SUMMARY OF LITIGATION EXPENSES THAT
9 ACCOMPANIED YOUR DIRECT TESTIMONY?

10 A. Yes. Upon further review of invoices following an ORS request, CWS eliminated an
11 additional \$1,480.50 of legal expenses. These expenses were related to other matters, not I-20.
12 However, the expenses are otherwise recoverable; they just were not incurred in the I-20 litigation.

13 Q. WITNESS HIPPI PROPOSED AN ADJUSTMENT TO REMOVE \$20,377 PAID TO
14 WINSTON AND STRAWN, LP. DO YOU AGREE WITH THIS ADJUSTMENT?

15 A. No, I do not. While Ms. Hipp testified that ORS could not verify the work performed by
16 Winston and Strawn was related to the Riverkeeper case, the plain language of the invoices reveals
17 the opposite. The invoices, which were filed under seal, clearly show that Winston and Strawn
18 were consulted regarding discovery issues in the Riverkeeper case. ORS never mentioned to the
19 Company they had any concern with the details on these invoices. If given the opportunity, the
20 Company would have been able to explain the fees and its relevance to the litigation. I've attached
21 a declaration from the firm confirming the invoices at issue in Ms. Hipp's testimony were for the
22 Riverkeeper case as Exhibit A. The Company respectfully requests that the Commission reaffirm
23 recovery of these expenses in this rehearing.

1 Q. WITNESS HIPPI PROPOSES REMOVING \$86,682 FOR ADVANCES AND
2 EXPENSES INVOICED BY WILLOUGHBY AND HOEFER P.A. FOR VARIOUS
3 CONSULTANTS AND ADVISORS. DO YOU AGREE?

4 A. No. Ms. Hipp bases her recommendation on the fact that CWS did not provide any vendor
5 invoices for the various expenses, and it did not assign them to specific litigation. I do not believe
6 anyone questions whether the advances and/or expenses were paid to the various parties, and they
7 were all related to the litigation. I have provided copies of the disputed invoices relating to
8 advances as Exhibit B. As clearly shown in the Exhibit, \$20,700.00 of advances paid were related
9 to the Riverkeeper case and \$52,060.00 of advances were related to the Condemnation case. The
10 Company respectfully requests recovery of these costs. The remaining \$13,922 were expenses
11 incurred as part of the ordinary course of business.

12 Q. WITNESS HIPPI PROPOSES REMOVING \$155,974 FOR LEGAL SERVICES
13 PERFORMED BY WILLOUGHBY AND HOEFER P.A. WHERE THE DESCRIPTION
14 OF THE LEGAL WORK WAS REDACTED. DOES THE COMPANY AGREE WITH
15 THIS ADJUSTMENT?

16 A. No. ORS proposes to disallow any invoices "where a description of work was redacted,"
17 even if the redaction was partial. Redactions to the invoices were necessary because they involve
18 ongoing litigation and CWS must protect privileged information and attorney work product. We
19 understood that ORS acknowledged the need for CWS to make redactions, and we have provided
20 ORS redacted legal invoices in past cases without incurring objection. We have been in frequent
21 communication with ORS providing information in response to the agency's discovery requests
22 and no one alerted us to this issue. We first learned of ORS's change of position in Ms. Hipp's

1 testimony. Even with redactions, the invoices provide ample basis to allow the recovery of these
2 expenses, and the Commission should allow them.

3 **Q. MS. HIPP PROPOSES TO REALLOCATE \$19,759 TO THE RIVERKEEPER**
4 **CASE FROM HOURS ATTRIBUTED TO ACTIONS PENDING BEFORE THE**
5 **ADMINISTRATIVE LAW COURT. DO YOU AGREE?**

6 **A.** CWS does not contest this reallocation.

7 **Q. MS. HIPP PROPOSES TO REALLOCATE \$2,985 TO CWS' SUIT AGAINST THE**
8 **TOWN OF LEXINGTON FROM WORK CWS ATTRIBUTED TO THE**
9 **CONDEMNATION ACTION. DO YOU AGREE?**

10 **A.** CWS does not contest this reallocation.

11 **Q. MS. HIPP PROPOSES TO REMOVE \$91,785.34 ASSOCIATED WITH THE EQ**
12 **REMEDATION WORK DONE AT THE FRIARSGATE WWTF AS IT IS NOT**
13 **ASSOCIATED WITH THE PROJECT. DO YOU AGREE?**

14 **A.** The Company agrees that the one invoice referenced for \$89,542.84 was not associated with
15 the EQ remediation project. It should have been coded to the Friarsgate Collection System project
16 as it was work required per the Consent Order No. 17-060-W and associated with Project ID #
17 2017102, which was included in plant in service in this rate case. The Company respectfully
18 requests inclusion of this invoice as part of the Collection System work that was performed at
19 Friarsgate consistent with the manner in which the Commission authorized recovery of other
20 Collection System amounts in this proceeding.

21 **Q. WHAT STEPS HAS CWS TAKEN TO ADDRESS THE SEWER SERVICE**
22 **CONCERNS OF THE DIXONS, KINGS AND WAGGONERS IN THE FORTY LOVE**
23 **POINT SUBDIVISION?**

1 **A.** In addition to retaining Goodwyn Mills and Cawood, Inc. to design both short-term and
2 long-term remedial solutions to their sewer service issues as referenced in the testimony of Forty
3 Love Point Homeowners Association Witness Dixon and Company Witness Laird, the Company
4 has suspended sewer service charges for the affected customers until satisfactory sewer service
5 has been restored. CWS is committed to providing excellent customer service and we believe these
6 bill suspensions are appropriate in light of the service issues experienced by these customers. The
7 Company continues to be proactive and transparent in all communications with customers.
8 Attached as Exhibit C are copies of correspondence from the Company to the Forty Love Point
9 homeowners since the hearing.

EXHIBIT A

Cartin Exhibit A

**WINSTON
& STRAWN**
LLP

North America Europe Asia

 35 W. Wacker Drive
Chicago, IL 60601
T +1 312 558 5600
F +1 312 558 5700
DECLARATION
 STATE OF ILLINOIS)
) SS.
COUNTY OF COOK)

THE UNDERSIGNED, hereby declares that all time entries on each of the following Winston & Strawn LLP invoices (the "Invoices") relate to legal services rendered solely in connection with the subpoena directed to Utilities, Inc. in the *Congaree Riverkeeper, Inc. v. Carolina Water Service, Inc.* matter in the United States District Court for the District of South Carolina.

Invoice No.	Invoice Date	Period Covered	Amount
2484939	March 11, 2016	February 2016	\$1,637.50
2487836	April 5, 2016	March 2016	\$17,415.32
2492556	May 5, 2016	April 2016	\$1,324.55
			\$20,377.37

Each of the Invoices was addressed to Vice President and General Counsel (U.S.), Corix Infrastructure Services (U.S.) Inc. 2335 Sanders Road, Northbrook, IL 60062. Each Invoice bears the title: **00001 Employee Benefits and Executive Compensation**. The Invoices bore this title despite the fact that the services were related solely to the subpoena directed to Utilities, Inc. in the *Congaree Riverkeeper, Inc. v. Carolina Water Service, Inc.* matter. The reason for this was because due to the limited duration and the relatively limited amount of services required, we did not set up a separate billing matter number and instead recorded our time and disbursements to an existing general matter number, for administrative convenience. All time entries were for Kevin Wolff, an associate in the Litigation Practice Group of Winston & Strawn LLP.

The Invoices were addressed to Vice President and General Counsel (U.S.), Corix Infrastructure Services (U.S.) Inc. In 2016, the address of Utilities, Inc. was 2335 Sanders Road, Northbrook, IL 60062, and the supervising attorney for all Utilities, Inc. legal matters had the title of Vice President and General Counsel (U.S.) of Utilities, Inc. parent company, Corix Infrastructure Services (U.S.) Inc.

DATED this 21st day of August 2018

Winston & Strawn, LLP

 By: Michael A. Mellick
A Partner

 Subscribed and sworn to before me this 21st day of August, 2018

 Elizabeth A. Colby
 Notary Public, State of Illinois
 My Commission Expires 10/07/2018

EXHIBIT B



WILLOUGHBY & HOEFER
ATTORNEYS AT LAW

CAROLINA WATER SERVICE, INC.
2335 Sanders Road
Northbrook IL 60062

PAGE: 1

July 18, 2018

ACCOUNT NO: [REDACTED]

SUPPLEMENT TO STATEMENT NO: 32

RE: I-20/CRK v. CWS Citizen Suit

Overnight Express & Delivery Services: FedEx/Southern Environmental Law/1-29-16 \$ 17.14

Consulting Services: Berkeley Economic Consulting, Inc./3-20-16 \$ 20,700.00

Total Advances Through 2-29-2016 \$ 20,717.14

Invoice Number	Invoice Date	Account Number	Page
5-313-54163	Feb 09, 2016		4 of 4

FedEx Express Shipment Detail By Payor Type (Original)

Ship Date: Jan 29, 2016 Cust Ref: 101 Date 2
 Payor: Shipper Ref: 2

- The Earned Discount for this ship date has been calculated based on a revenue threshold of \$30.20
- Fuel Surcharge - FedEx has applied a fuel surcharge of 2.25% to this shipment.
- Distance Based Pricing, Zone 2

Automation	INET	Sender	Recipient	
Tracking ID	775535376970	Chad N. Johnston	Blan Holman, Esquire	
Service Type	FedEx Priority Overnight	Willoughby & Hoefler, PA	Southern Environmental Law Cen	
Package Type	FedEx Envelope	930 Richland Street	463 King Street	
Zone	02	COLUMBIA SC 29201 US	CHARLESTON SC 29403 US	
Packages	1			
Rated Weight	N/A	Transportation Charge		21.77
Delivered	Feb 01, 2016 08:33	Earned Discount		-2.83
Svc Area	A1	Automation Bonus Discount		-2.18
Signed by	H.HOLMAN	Fuel Surcharge		.038
FedEx Use	000000000/0000186/_	Total Charge	USD	\$17.14
		Shipper Subtotal	USD	\$17.14
		Total FedEx Express	USD	\$17.14

BERKELEY ECONOMIC CONSULTING, INC.
120 STURDIVANT AVENUE
SAN ANSELMO, CA 94960

Via Electronic Mail

March 20, 2016

Randolph R. Lowell
Willoughby & Hoefner, P.A.
P.O. Box 8416
Columbia, SC 29202-8416

Dear Randy:

This is an invoice for expert consulting work performed during the month of February 2016 in the matter of Congaree Riverkeeper v. Carolina Water Service. During this time, I completed an expert report that was filed with the court.

The labor detail for this invoice is as follows:

	Hours	Rate	Amount
David Sunding	6	\$600/hr	\$3,600
Steve Hamilton	38	\$450/hr	\$17,100
Total			\$20,700

Please make all checks payable to Berkeley Economic Consulting, Inc., 120 Sturdivant Avenue, San Anselmo, CA 94960.

I look forward to hearing from you regarding the progress of the case. Let me know if I can provide any further assistance.

Best,

David Sunding
Professor, UC Berkeley

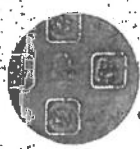
WILLOUGHBY & HOEFER, P.A. • GENERAL ACCOUNT

BERKELEY ECONOMIC CONSULTING, INC.

03/24/16	CWS - Congaree Riverkeeper v. CWS -	3-20-2016	20,700.00	20,700.00
	Expert consulting work			

03/24/16	24450	Gross:	20,700.00	Ded:	0.00	Net:	20,700.00
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WILLOUGHBY & HOEFER, P.A.
ATTORNEYS & COUNSELLORS AT LAW
(803) 252-3300
P.O. BOX 8416
COLUMBIA, SC 29202-8416



First Community Bank
LEXINGTON, SC

24450

NO.

PAY:

03/24/16	DATE	*\$20,700.00
		AMOUNT

*** TWENTY THOUSAND SEVEN HUNDRED & 00/100 DOLLARS

TO THE
ORDER
OF

BERKELEY ECONOMIC CONSULTING, INC.
120 Sturdivant Avenue
San Anselmo CA 94960

WILLOUGHBY & HOEFER, P.A.
GENERAL ACCOUNT

Shield

WILLOUGHBY & HOEFER, P.A. • GENERAL ACCOUNT

24450



WILLOUGHBY & HOEFER
ATTORNEYS AT LAW

CAROLINA WATER SERVICE, INC.
2335 Sanders Road
Northbrook IL 60062

PAGE: 1

July 18, 2018

ACCOUNT NO: [REDACTED]

SUPPLEMENT TO STATEMENT NO: 40

RE: I-20/Town v. CWS Condemnation

Miscellaneous: Hartman Consultants, LLC (Inv # I-Inception-9/24/16)/10-31-2016 \$ 3,200.00

Total Advances Through 10/31/2016 \$ 3,200.00

Hartman Consultants, LLC

www.hartmanconsultant.com

September 25, 2016

HC # [REDACTED]

Mr. John M.S. Hoefer, Esq.
Willoughby & Hoefer, P.A.
930 Richland Street
P.O. Box 8416
Columbia, SC 29202-8416

RECEIVED

OCT 6 2016

Willoughby & Hoefer, P.A.

RE: I-20 Wastewater System Appraisal
Invoice #1-Inception-9/24/2016

Dear Mrs. Hoefer:

This letter serves as Invoice #1 for the above referenced project.

Total Lump Sum	\$24,500.00
Percent Complete	10%
HC-	\$2,450.00

Vista-Total Lump Sum	\$ 7,500.00
Percent Complete	10%
Vista-	\$ 750.00

Total Invoice #1	\$ 3,200.00
------------------	-------------

Please remit to address shown hereon.

Very truly yours,
Hartman Consultants, LLC

Gerald C. Hartman
PE, BCEE, ASA
p.p.



2107 Water Key Dr. • Windermere, FL 34786
Tel. 407-341-0970 • Fax 407-909-9882 • gerry@hartmanconsultant.com

WILLOUGHBY & HOEFER, P.A. • GENERAL ACCOUNT

25101

HARTMAN CONSULTANTS, LLC

10/07/16 CWS I-20 Potential Condemnation (Inv
1-Inception-9/24/16)

1

3,200.00

3,200.00

10/07/16

25105

Gross:

3,200.00

Ded:

0.00 Net:

3,200.00

WILLOUGHBY & HOEFER, P.A.
ATTORNEYS & COUNSELLORS AT LAW
(803) 252-3300
P.O. BOX 8416
COLUMBIA, SC 29202-8416



First
Community
Bank

LEXINGTON, SC

25105

NO.

PAY:

10/07/16

**\$3,200.00

DATE

AMOUNT

*** THREE THOUSAND TWO HUNDRED & 00/100 DOLLARS

TO THE
ORDER
OF

HARTMAN CONSULTANTS, LLC
2107 Water Key Drive
Windermere FL 34786

WILLOUGHBY & HOEFER, P.A.
GENERAL ACCOUNT

Tarant Edwards

Shield

WILLOUGHBY & HOEFER, P.A. • GENERAL ACCOUNT

25105

Date	Description	Invoice #	Amount	Disc	Net Amt
10/07/16	CWS I-20 Potential Condemnation (Inv # 1-Inception-9/24/16)	1	3,200.00		3,200.00
Check Date	Check #	Gross Amt	Disc Amt	Net Amt	
10/07/16	25105	3,200.00	0.00	3,200.00	



WILLOUGHBY & HOEFER
ATTORNEYS AT LAW

CAROLINA WATER SERVICE, INC.
2335 Sanders Road
Northbrook IL 60062

PAGE: 1

July 18, 2018

ACCOUNT NO: [REDACTED]

SUPPLEMENT TO STATEMENT NO: 41

RE: I-20/Town v. CWS Condemnation

Miscellaneous: Hartman Consultants, LLC (Invoice #2)/11-30-2016	\$ 980.00
Miscellaneous: Hartman Consultants, LLC (Invoice #3)/11-30-2016	\$1,470.00
Total Advances Through 11/30/2016	\$2,450.00

Hartman Consultants, LLC

www.hartmanconsultant.com

October 23, 2016

HC # [REDACTED]

Mr. John M.S. Hoefer, Esq.
Willoughby & Hoefer, P.A.
930 Richland Street
P.O. Box 8416
Columbia, SC 29202-8416

RECEIVED

OCT 28 2016

Willoughby & Hoefer, P.A.

**RE: I-20 Wastewater System Appraisal
Invoice #2-Inception-9/25/2016-10/22/2016**

Dear Mrs. Hoefer:

This letter serves as Invoice #2 for the above referenced project.

Total Lump Sum	\$24,500.00
Percent Complete	14% (10% pd.)
HC-	\$980.00
Vista-Total Lump Sum	\$ 7,500.00
Percent Complete	10% (10% pd.)
Vista-	0.00

Total Invoice #2 \$ 980.00

Please remit to address shown hereon.

Very truly yours,
Hartman Consultants, LLC

Gerald C. Hartman
PE, BCEE, ASA

p.p.



2107 Water Key Dr. • Windermere, FL 34786
Tel. 407-341-0970 • Fax 407-909-9882 • gerry@hartmanconsultant.com

2531

HARTMAN CONSULTANTS, LLC
12/02/16 CWS I-20 Potential Condemnation (Inv
3-Inception-11/19/16)

3

1,470.00

1,470.00

12/02/16

25313

Gross:

1,470.00

Ded:

0.00 Net:

1,470.00

WILLOUGHBY & HOEFER, P.A.
ATTORNEYS & COUNSELLORS AT LAW
(803) 252-3300
P.O. BOX 8418
COLUMBIA, SC 29212-8418



First
Community
Bank

LEXINGTON, SC

2531

NO.

12/02/16

DATE

**\$1,470.00

AMOUNT

*** ONE THOUSAND FOUR HUNDRED SEVENTY & 00/100 DOLLARS

PAY:

TO THE
ORDER
OF

HARTMAN CONSULTANTS, LLC
2107 Water Key Drive
Windermere FL 34786

WILLOUGHBY & HOEFER, P.A.
GENERAL ACCOUNT



WILLOUGHBY & HOEFER, P.A.
HARTMAN CONSULTANTS, LLC

25313

Date	Description	Invoice #	Amount	Disc	Net Amt
12/02/16	CWS I-20 Potential Condemnation (Inv # 3-Inception-11/19/16)	3	1,470.00		1,470.00
Check Date	Check #	Gross Amt	Disc Amt	Net Amt	
12/02/16	25313	1,470.00	0.00	1,470.00	

HARTMAN CONSULTANTS, LLC

11/11/16 CWS I-20 Potential Condemnation (Inv
2-Inception-10/22/16)

2

980.00

980.00

11/11/16

25233

Gross:

980.00

Ded:

0.00 Net:

980.00

25233

WILLOUGHBY & HOEFER, P.A.
ATTORNEYS & COUNSELLORS AT LAW
(803) 252-3300
P.O. BOX 8416
COLUMBIA, SC 29202-8416



First
Community
Bank

LEXINGTON, SC

NO.

11/11/16

****\$980.00

/ DATE

AMOUNT

PAY:

*** NINE HUNDRED EIGHTY & 00/100 DOLLARS

TO THE
ORDER
OF

HARTMAN CONSULTANTS, LLC
2107 Water Key Drive
Windermere FL 34785

WILLOUGHBY & HOEFER, P.A.
GENERAL ACCOUNT

Frederic V. Edwards

Shield

Hartman Consultants, LLC
 www.hartmanconsultant.com

November 20, 2016

HC # [REDACTED]

Mr. John M.S. Hoefer, Esq.
 Willoughby & Hoefer, P.A.
 930 Richland Street
 P.O. Box 8416
 Columbia, SC 29202-8416

RE: I-20 Wastewater System Appraisal
Invoice #3-Inception-10/23/2016-11/19/2016

Dear Mrs. Hoefer:

This letter serves as Invoice #3 for the above referenced project.

Total Lump Sum	\$ 24,500.00
Percent Complete	20%
HC-	\$1,470.00
Vista-Total Lump Sum	\$ 7,500.00
Percent Complete	10% (10% pd.)
Vista-	0.00
Total Invoice #3	\$ 1,470.00

Please remit to address shown hereon.

Very truly yours,
 Hartman Consultants, LLC

Gerald C. Hartman
 PE, BCEE, ASA
 p.p.

Gerald C. Hartman

RECEIVED

DEC 02 2016

Willoughby & Hoefer, P.A.

2107 Water Key Dr. • Windermere, FL 34786
 Tel. 407-341-0970 • Fax 407-909-9882 • gerry@hartmanconsultant.com



WILLOUGHBY & HOEFER
ATTORNEYS AT LAW

CAROLINA WATER SERVICE, INC.
2335 Sanders Road
Northbrook IL 60062

PAGE: 1

July 18, 2018

ACCOUNT NO: [REDACTED]

SUPPLEMENT TO STATEMENT NO: 43

RE: I-20/Town v. CWS Condemnation

Miscellaneous: Hartman Consultants, LLC (Inv#: 4)/1-31-2017

\$ 7,150.00

Total Advances Through 1/31/2017

\$ 7,150.00

RECEIVED

JAN 03 2017

Willoughby & Hoefer, P.A.

Hartman Consultants, LLC
 www.hartmanconsultant.com

December 18, 2016

HC # [REDACTED]

Mr. John M.S. Hoefer, Esq.
 Willoughby & Hoefer, P.A.
 930 Richland Street
 P.O. Box 8416
 Columbia, SC 29202-8416

RE: I-20 Wastewater System Appraisal
Invoice #4-11/20/2016-12/17/2016

Dear Mrs. Hoefer:

This letter serves as Invoice #4 for the above referenced project.

Total Lump Sum	\$ 24,500.00
Percent Complete	40%
HC-	\$ 4,900.00

Vista-Total Lump Sum	\$ 7,500.00
Percent Complete	40%
Vista-	\$ 2,250.00


Total Invoice #4	\$ 7,150.00
-------------------------	--------------------

Please remit to address shown hereon.

Hartman Consultants, LLC.,
300 S. Interlachen Ave., Unit 503
Winter park, FL 32789

Very truly yours,
 Hartman Consultants, LLC

Gerald C. Hartman
 PE, BCEE, ASA
 p.p.



2107 Water Key Dr. • Windermere, FL 34786
 Tel. 407-341-0970 • Fax 407-909-9882 • gerry@hartmanconsultant.com

HARTMAN CONSULTANTS, LLC

01/05/17 CWS I-20 Potential Condemnation (Inv
4 11/20-12/17/16)

4

7,150.00

7,150.00

01/05/17

25434

Gross:

7,150.00

Ded:

0.00 Net:

7,150.00

WILLOUGHBY & HOEFER, P.A.
ATTORNEYS & COUNSELLORS AT LAW
(803) 252-3300
P.O. BOX 8416
COLUMBIA, SC 29202-8416First
Community
Bank

LEXINGTON, SC

25434

NO.

PAY:

01/05/17

**\$7,150.00

DATE

AMOUNT

*** SEVEN THOUSAND ONE HUNDRED FIFTY & 00/100 DOLLARS

TO THE
ORDER
OFHARTMAN CONSULTANTS, LLC
2107 Water Key Drive
Windermere FL 34786WILLOUGHBY & HOEFER, P.A.
GENERAL ACCOUNT

Shick

11 025434 109920210810041820

WILLOUGHBY & HOEFER, P.A. - GENERAL ACCOUNT

25434

Date	Description	Invoice #	Amount	Disc	Net Amt
01/05/17	CWS I-20 Potential Condemnation (Inv # 4 11/20-12/17/16)	4	7,150.00		7,150.00
Check Date	Check #	Gross Amt	Disc Amt	Net Amt	
01/05/17	25434	7,150.00	0.00	7,150.00	



WILLOUGHBY & HOEFER
ATTORNEYS AT LAW

CAROLINA WATER SERVICE, INC.
2335 Sanders Road
Northbrook IL 60062

PAGE: 1

July 18, 2018

ACCOUNT NO: [REDACTED]

SUPPLEMENT TO STATEMENT NO: 44

RE: I-20/Town v. CWS Condemnation

Miscellaneous: Hartman Consultants, LLC (Inv #s 5 & 6)/2-28-2017	\$ 9,225.00
--	-------------

Total Advances Through 2/28/2017	\$ 9,225.00
----------------------------------	-------------

Hartman Consultants, LLC

www.hartmanconsultant.com

January 31, 2017

HC # 6021.01

Mr. John M.S. Hofer, Esq.
Willoughby & Hofer, P.A.
930 Richland Street
P.O. Box 8416
Columbia, SC 29202-8416

RECEIVED

FEB 10 2017

Willoughby & Hofer, P.A.

RE: I-20 Wastewater System Appraisal Verbal Done-Project on Hold.
Invoice #6 - 1/14/2017-1/31/2017

Dear Mrs. Hofer:

This letter serves as Invoice #6 for the above referenced project.

Total Lump Sum	\$ 24,500.00
Percent Complete	70%
HC-	\$ 2,450.00

Vista-Total Lump Sum	\$ 7,500.00
Percent Complete	65%
Vista-	\$ 375.00

Total Invoice #6	\$ 2,825.00
-------------------------	--------------------

Amount Outstanding:

Invoice #5	\$ 6,400.00
Invoice #6	\$ 2,825.00
Total Due:	\$ 9,225.00

Very truly yours,
Hartman Consultants, LLC

Gerald C. Hartman
PE, BCEE, ASA

p.p.



300 S. Interlachen Ave. • Unit #503 • Winter Park, FL 32789
Tel. 407-341-0970 • Fax 407-909-9882 • gerry@hartmanconsultant.com

Hartman Consultants, LLC
 www.hartmanconsultant.com

January 15, 2017

HC # [REDACTED]

Mr. John M.S. Hoefer, Esq.
 Willoughby & Hoefer, P.A.
 930 Richland Street
 P.O. Box 8416
 Columbia, SC 29202-8416

RE: I-20 Wastewater System Appraisal
Invoice #5-12/18/2016-1/14/2017

Dear Mrs. Hoefer:

This letter serves as Invoice #5 for the above referenced project.

Total Lump Sum	\$ 24,500.00
Percent Complete	60%
HC-	\$ 4,900.00
Vista-Total Lump Sum	\$ 7,500.00
Percent Complete	60%
Vista-	\$ 1,500.00
Total Invoice #5	\$ 6,400.00

Please remit to address shown hereon.

Hartman Consultants, LLC.,
300 S. Interlachen Ave., Unit 503
Winter park, FL 32789

Very truly yours,
 Hartman Consultants, LLC

Gerald C. Hartman
 PE, BCEE, ASA
 p.p.



RECEIVED

JAN 20 2017

Willoughby & Hoefer, P.A.

300 S. Interlachen Ave. • Unit #503 • Winter Park, FL 32789
 Tel. 407-341-0970 • Fax 407-909-9882 • gerry@hartmanconsultant.com

WILLOUGHBY & HOEFER, P.A. • GENERAL ACCOUNT

255.

HARTMAN CONSULTANTS, LLC
02/13/17 CWS I-20 Potential Condem. (Inv # 5 &
6 12/20/16 -1/31/17)

5 & 6

9,225.00

9,225.00

02/13/17

25586

Gross:

9,225.00

Ded:

0.00 Net:

9,225.00

DOCUMENT INCLUDES VOIDABLE RIBBONS CHEMICAL REACTIVE PROPERTIES AND FEATURES A FOIL HOTGRAM

WILLOUGHBY & HOEFER, P.A.
ATTORNEYS & COUNSELLORS AT LAW
(803) 252-8300
P.O. BOX 8416
COLUMBIA, SC 29202-8416

First Community Bank, LEXINGTON, SC

2558

NO.

PAY: 02/13/17 DATE **\$9,225.00 AMOUNT

*** NINE THOUSAND TWO HUNDRED TWENTY-FIVE & 00/100 DOLLARS

TO THE ORDER OF HARTMAN CONSULTANTS, LLC
2107 Water Key Drive
Windermere, FL 34786

WILLOUGHBY & HOEFER, P.A.
GENERAL ACCOUNT

TRUE WATER MARK PAPER - HOLD TO LIGHT TO VIEW

PAPER CONTAINS TONER/ADHESION PROPERTIES

HEAT SENSITIVE RED IMAGE DISAPPEARS WITH HEAT

WILLOUGHBY & HOEFER, P.A. • GENERAL ACCOUNT

25586

Date	Description	Invoice #	Amount	Disc	Net Amt
02/13/17	CWS I-20 Potential Condem. (Inv # 5 & 6 12/20/16 -1/31/17)	5 & 6	9,225.00		9,225.00
Check Date	Check #	Gross Amt	Disc Amt	Net Amt	
02/13/17	25586	9,225.00	0.00	9,225.00	



WILLOUGHBY & HOEFER
ATTORNEYS AT LAW

CAROLINA WATER SERVICE, INC.
2335 Sanders Road
Northbrook IL 60062

PAGE: 1
July 18, 2018
ACCOUNT NO: [REDACTED]
SUPPLEMENT TO STATEMENT NO: 45

RE: I-20/Town v. CWS Condemnation

Consulting Services: Hartman Consultants, LLC/Invoices 1 & 2 \$ 10,000.00

Total Advances Through 3-31-2017 \$ 10,000.00

Hartman Consultants, LLC

www.hartmanconsultant.com

March 21, 2017

HC # [REDACTED]

Mr. John M.S. Hoefer, Esq.
Willoughby & Hoefer, P.A.
930 Richland Street
P.O. Box 8416
Columbia, SC 29202-8416

RECEIVED

MAR 27 2017

Willoughby & Hoefer, P.A.

RE: I-20 Wastewater System Appraisal Report
Invoice #2
3/11/2017-3/20/2017- Final Invoice

Dear Mr. Hoefer:

This letter serves as Invoice #2 for the above referenced project.

Total Lump Sum	\$ 10,000.00
Percent Complete	100%
	<u>\$10,000.00</u>
Invoice #1	\$ 5,000.00
Invoice #2	<u>\$ 5,000.00</u>
Total	\$ 10,000.00

Very truly yours,
Hartman Consultants, LLC
Gerald C. Hartman
PE, BCEE, ASA
p.p.



300 S. Interlachen Ave. • Unit #503 • Winter Park, FL 32789
Tel. 407-341-0970 • Fax 407-909-9882 • gerry@hartmanconsultant.com

WILLOUGHBY & HOEFER, P.A. - GENERAL ACCOUNT

HARTMAN CONSULTANTS, LLC
 03/27/17 CWS I-20 Wastewater System
 Appraisal Report (Inv # 1 & #2)

1 & 2

10,000.00

10,000.00

03/27/17 25735 Gross: 10,000.00 Ded: 0.00 Net: 10,000.00

WILLOUGHBY & HOEFER, P.A.
 ATTORNEYS & COUNSELLORS AT LAW
 (803) 252-3300
 P.O. BOX 8416
 COLUMBIA, SC 29202-8416



Office
 Community Bank
 LEXINGTON, SC

NO.

03/27/17

*\$10,000.00
 AMOUNT

PAY:

DATE

*** TEN THOUSAND & 00/100 DOLLARS

TO THE
 ORDER
 OF

HARTMAN CONSULTANTS, LLC
 300 South Interlachen Avenue
 Unit 503
 Winter Park, FL 32789

WILLOUGHBY & HOEFER, P.A.
 GENERAL ACCOUNT

Karen Edwards

TRUE WATERMARK PAPER - HOLD TO LIGHT TO VIEW - PAPER CONTAINS TONER ADHESION PROPERTIES - HEAT SENSITIVE RED IMAGE DISAPPEARS WITH HEAT

WILLOUGHBY & HOEFER, P.A. - GENERAL ACCOUNT

Date	Description	Invoice #	Amount	Disc	Net Amt
03/27/17	CWS I-20 Wastewater System Appraisal Report (Inv # 1 & #2)	1 & 2	10,000.00		10,000.00
Check Date	Check #	Gross Amt	Disc Amt	Net Amt	
03/27/17	25735	10,000.00	0.00	10,000.00	



WILLOUGHBY & HOEFER
ATTORNEYS AT LAW

CAROLINA WATER SERVICE, INC.
2335 Sanders Road
Northbrook IL 60062

PAGE: 1

July 18, 2018

ACCOUNT NO: [REDACTED]

SUPPLEMENT TO STATEMENT NO: 45

RE: I-20/CRK v. CWS Citizen Suit

Overnight Express & Delivery Services: FedEx/Southern Environmental Law/3-27-17	\$ 21.60
Transcript of Record: Summary Judgment Hearing/Kathleen Richardson/11-17-16	\$ 310.40
Total Advances Through 3-31-2017	\$ 332.00

Invoice Number

5-758-36620

Invoice Date

Apr 04, 2017

Account Number

Page

4 of 4

FedEx Express Shipment Detail By Payor Type (Original)

Ship Date: Mar 27, 2017

Invoice Ref: 221

Ref #2:

Payor: Shipper

- Fuel Surcharge - FedEx has applied a fuel surcharge of 2.75% to this shipment
- The Earned Discount for this ship date has been calculated based on a revenue threshold of \$33.25
- Distance Based Pricing, Zone 2
- FedEx has audited this shipment for correct packages, weight, and service. Any changes made are reflected in the Invoice amount.
- The package weight exceeds the maximum for the packaging type, therefore, FedEx Envelope was rated as FedEx Pak.

Automation

INET

Tracking ID

778750816192

Service Type

FedEx Priority Overnight

Package Type

FedEx Pak

Zone

02

Packages

1

Rated Weight

2.0 lbs, 0.9 kgs

Delivered

Mar 28, 2017 10:27

Svc Area

A1

Signed by

R.PRUIZIN

FedEx Use

000000000/1486/

Sender

John MS Hoefer

Willoughby & Hoefer, PA

930 Richland Street

COLUMBIA SC 29201 US

Recipient

Catherine M. Wannamaker, Esqui

Southern Environmental Law Cen

463 King Street

CHARLESTON SC 29403 US

Transportation Charge

26.94

Fuel Surcharge

0.58

Automation Bonus Discount

-2.69

Earned Discount

-3.23

Total Charge

USD

\$21.60

Shipper Subtotal

USD

\$21.60

Total FedEx Express

USD

\$21.60

WILLOUGHBY & HOEFER, P.A. • GENERAL ACCOUNT

Kathleen Richardson, RMR, CRR
03/10/17 Transcript o f11-17-16 SJ Hearing CWS
I-20

310.40 310.40

03/10/17 25680 Gross: 310.40 Ded: 0.00 Net: 310.40

DOCUMENT INCLUDES VISIBLE FIBERS, CHEMICAL REACTIVE PROPERTIES AND FEATURES A FOIR HOLOGRAM

WILLOUGHBY & HOEFER, P.A.
ATTORNEYS & COUNSELLORS AT LAW
(803) 252-3300
P.O. BOX 8416
COLUMBIA, SC 29202-8416

First Community Bank
LEXINGTON, SC

25680

NO.

PAY: 03/10/17 DATE ***\$310.40 AMOUNT

*** THREE HUNDRED TEN & 40/100 DOLLARS

TO THE ORDER OF Kathleen Richardson, RMR, CRR
US Court Reporter

WILLOUGHBY & HOEFER, P.A.
GENERAL ACCOUNT

Signature: *Barney Edwards*

TRUE WATER MARK PAPER #HOLD TO LIGHT TO VIEW# PAPER DOES NOT STAIN TONER ADHESION PROPERTIES HEAT SENSITIVE REC IMAGE DISAPPEARS WITH HEAT

Vendor Kathleen Richardson, RMR, CRR

25680

Date	Description	Invoice #	Amount	Disc	Net Amt
03/10/17	Transcript o f11-17-16 SJ Hearing CWS I-20		310.40		310.40

Check Date	Check #	Gross Amt	Disc Amt	Net Amt
03/10/17	25680	310.40	0.00	310.40



WILLOUGHBY & HOEFER
ATTORNEYS AT LAW

CAROLINA WATER SERVICE, INC.
2335 Sanders Road
Northbrook IL 60062

PAGE: 1

July 18, 2018

ACCOUNT NO: [REDACTED]

SUPPLEMENT TO STATEMENT NO: 51

RE: I-20/Town v. CWS Condemnation

Miscellaneous: Hartman Consultants, LLC (Invoice September & October 2017)/11-16-2017	\$ 665.00
Miscellaneous: Winthrop Real Estate Advisors - Consulting Services/12-05-2017	\$15,000.00
Miscellaneous: Hartman Consultants, LLC (Appraisal & Engineering Work)/12-08-2017	\$ 4,370.00
Total Advances Through 12/31/2017	\$ 20,035.00

[REDACTED]

Hartman Consultants, LLC

www.hartmanconsultant.com

October 21, 2017

HC # [REDACTED]

Mr. John M.S. Hoefer, Esq.
 Willoughby & Hoefer, P.A.
 930 Richland Street
 P.O. Box 8416
 Columbia, SC 29202-8416

RE: I-20 Wastewater System Appraisal
Invoice Sept. & October, 2017

Dear Mrs. Hoefer:

This letter serves as the Invoice for the above referenced review, comments, a verbal reporting work to you for CWS.

Date	Description	Hrs.	Rate	Cost
9/25	J. Hoefer Call & email	1	190.00 \$	190.00
	Review of Fed Express Rpt. & Call with			
	Verbal Initial & Conceptual ARM			
9/26	Comments, Appraisal Review &	2.5	190.00 \$	475.00
	Management			
Total Invoice				\$ 665.00

Very truly yours,
 Hartman Consultants, LLC

Gerald C. Hartman
 PE, BCEE, ASA
 p.p.



300 S. Interlachen Ave. • Unit # 503 • Winter Park, FL 32789
 Tel. 407-341-0970 • Fax 407-909-9882 • gerry@hartmanconsultant.com

26428

GENERAL ACCOUNT
HARTMAN CONSULTANTS, LLC
CWS I-20 Wastewater System
Appraisal Report (Inv Sep & Oct)

SEP & OCT 665.00 665.00

CWS
I-20

11/16/17 26428 Gross: 665.00 Ded: 0.00 Net: 665.00

WILLOUGHBY & HOEFER, P.A.
ATTORNEYS & COUNSELLORS AT LAW
(803) 252-3300
P.O. BOX 8416
COLUMBIA, SC 29202-8416

First Community Bank LEXINGTON, SC

NO. 26428

PAY: 11/16/17 DATE *****\$665.00 AMOUNT

*** SIX HUNDRED SIXTY-FIVE & 00/100 DOLLARS

TO THE ORDER OF HARTMAN CONSULTANTS, LLC
300 South Interlachen Avenue
Unit 503
Winter Park FL 32789

WILLOUGHBY & HOEFER, P.A.
GENERAL ACCOUNT

Shield

WILLOUGHBY & HOEFER, P.A. HARTMAN CONSULTANTS, LLC 26428

Date	Description	Invoice #	Amount	Disc	Net Amt
11/16/17	CWS I-20 Wastewater System Appraisal Report (Inv Sep & Oct)	SEP & OCT	665.00		665.00
Check Date	Check #	Gross Amt	Disc Amt	Net Amt	
11/16/17	26428	665.00	0.00	665.00	



February 7, 2018

John M.S. Hoefer, Esq.
Willoughby & Hoefer, P.A.
930 Richland Street
P. O. Box 8416
Columbia, South Carolina 29202-8416

Re Town of Lexington, SC v Carolina Water Service, Inc. / Utilities, Inc.
1-20 Regional Sewer System

Dear Mr. Hoefer:

Pursuant to our letter of engagement dated December 4, 2017, please find our invoice in the amount of \$20,730.00 for professional services rendered beginning on December 4, 2017 and ending on February 7, 2018.

Please remit payment to:

Winthrop Real Estate Advisors
P.O. Box 6257
Columbia, South Carolina 29260

We thank you for the opportunity to assist in this matter. If you have any questions, please do not hesitate to call.

Sincerely,
Winthrop Real Estate Advisors

Deborah B. Haskell, CRE, MAI, FRICS
Managing Partner

Columbia, South Carolina 29202
Telephone 803.586.3514
Email dhaskell@winthroprea.com

Boston, Massachusetts 02110
Telephone 617.366.7588

WREA BILLING PRO FORM A

CLIENT	Willoughby & Hoefer, P.A.	Date of Last Invoice
MATTER	John M.S. Hoefer, Esquire	Date of Last Payment
MATTER NUMBER	Carolina Water Service, Inc. / Utilities, Inc.	Matter Open Date
	I-20 Regional Sewer System	12/4/17
	2017.1204	

ACCOUNTS RECEIVABLE SUMMARY

Total Outstanding Fees	\$35,730.00
Total Outstanding Expenses	\$0.00
Total Current Expenses	\$0.00
Total Payments of Fees To Date	\$0.00
Total Payments of Expenses To Date	\$0.00
Retainer	\$15,000.00 *
NET ACCOUNTS RECEIVABLE	\$20,730.00

EXPENSE SUMMARY

Description	Billable Amount
TOTAL CURRENT BILLABLE EXPENSES	\$0.00

TIME LOG

Date	Name	Hours	Rate	Description	Billable
12/5/17	Haskell, Deborah	1.9	\$450.00	Review documents and plans of CWS service area and Town of Lexington SC condemnation	\$855.00
12/6/17	Haskell, Deborah	4.6	\$450.00	Field review of land uses in the CWS service area	\$2,070.00
12/12/17	Haskell, Deborah	5.5	\$450.00	Review parcel data, zoning and land uses in CWS service area	\$2,475.00
12/14/17	Haskell, Deborah	5.7	\$450.00	Review parcel data, zoning and land uses in CWS service area	\$2,565.00
12/15/17	Haskell, Deborah	6.4	\$450.00	Research data on residential neighborhoods in the CWS service area	\$2,880.00
12/18/17	Haskell, Deborah	4.8	\$450.00	Research data on residential neighborhoods in the CWS service area	\$2,160.00
1/5/18	Haskell, Deborah	3.8	\$450.00	Research lots sales in Lexington County	\$1,710.00
1/9/18	Haskell, Deborah	4.9	\$450.00	Research lots sales in Lexington County	\$2,205.00
1/12/18	Haskell, Deborah	5.1	\$450.00	Research lots sales in Lexington County	\$2,295.00
1/16/17	Haskell, Deborah	4.2	\$450.00	Research lots sales in Lexington County	\$1,890.00
1/19/18	Haskell, Deborah	6.2	\$450.00	Analysis of data	\$2,790.00
1/23/18	Haskell, Deborah	6.2	\$450.00	Analysis of data	\$2,790.00
1/24/18	Haskell, Deborah	6.1	\$450.00	Prepare report	\$2,745.00
1/25/18	Haskell, Deborah	5.8	\$450.00	Prepare report	\$2,610.00
1/27/18	Haskell, Deborah	3.9	\$450.00	Prepare report	\$1,755.00
1/29/18	Haskell, Deborah	3.1	\$450.00	Prepare report	\$1,395.00
2/1/18	Haskell, Deborah	0.5	\$450.00	Conference call with client	\$225.00
2/6/18	Haskell, Deborah	0.7	\$450.00	Conference call with client	\$315.00
Total Unbilled Time		79.4			\$35,730.00

WILLOUGHBY'S HOMES, PA.
AUTOMATED COMMERCIAL PAYMENT
1001 W. 10TH ST.
COLUMBIA, SC 29202-0001

12/05/17

12/05/17

15,000.00

FIFTEEN THOUSAND & 00/100 DOLLARS

WILLOUGHBY'S HOMES, PA.
AUTOMATED COMMERCIAL PAYMENT
1001 W. 10TH ST.
COLUMBIA, SC 29202-0001

TO THE ORDER OF

12/05/17

15,000.00

WILLOUGHBY'S HOMES, PA.
AUTOMATED COMMERCIAL PAYMENT
1001 W. 10TH ST.
COLUMBIA, SC 29202-0001

12/05/2017

Check 26455

\$15,000.00

Hartman Consultants, LLC

www.hartmanconsultant.com

November 19, 2017

HC # [REDACTED]

Mr. John M.S. Hoefer, Esq.
Willoughby & Hoefer, P.A.
930 Richland Street
P.O. Box 8416
Columbia, SC 29202-8416

RE: I-20 Wastewater System -Appraisal & Engineering Work

Dear Mrs. Hoefer:

This letter serves as the Invoice for the above referenced review, comments, a verbal reporting work to you and Mr. Joe Conner, Esq. for CWS.

Date	Description	Hrs.	Rate	Cost
11/9	Connor Call	0.2	190.00	\$ 38.00
11/10	Research, Doc., Connor Call	1.4	190.00	\$ 266.00
11/11- 3/1/2 017	Report Rev., Update Request	2.2	190.00	\$ 418.00
11/13	Update Work	1.1	190.00	\$ 209.00
11/14	Update Work	1.8	190.00	\$ 342.00
11/15	Comps Research	2.2	190.00	\$ 418.00
11/16	Cost Research	2.6	190.00	\$ 494.00
11/17	Update Report Draft	8	190.00	\$ 1,520.00
	Awaiting data for final edits			
	Invoice #2			\$ 3,705.00
	Invoice #1			\$ 665.00
	Amount Due			\$ 4,370.00

Very truly yours,
Hartman Consultants, LLC

Gerald C. Hartman
PE, BCEE, ASA
p.p.



300 S. Interlachen Ave. • Unit # 503 • Winter Park, FL 32789
Tel. 407-341-0970 • Fax 407-909-9882 • gerry@hartmanconsultant.com

2645

HARTMAN CONSULTANTS, LLC
12/08/17 CWS I-20 Wastewater System
Appraisal Report (Inv Nov)

NOV

4,370.00

4,370.00

12/08/17

26458

Gross:

4,370.00

Ded:

0.00 Net:

4,370.00

WILLOUGHBY & HOEFER, P.A.
ATTORNEYS & COUNSELLORS AT LAW
(803) 252-3300
P.O. BOX 8416
COLUMBIA, SC 29202-8416



First Community Bank

LEXINGTON, SC

26458

NO.

12/08/17

DATE

**\$4,370.00

AMOUNT

*** FOUR THOUSAND THREE HUNDRED SEVENTY & 00/100 DOLLARS

HARTMAN CONSULTANTS, LLC
300 South Interlachen Avenue
Unit 503
Winter Park, FL 32789

WILLOUGHBY & HOEFER, P.A.
GENERAL ACCOUNT

TRUE WATERMARK PAPER - HOLD TO LIGHT TO VIEW

PAPER CONTAINS TONER ADHESION PROPERTIES

HEAT SENSITIVE RED IMAGE DISAPPEARS WITH HEAT

WILLOUGHBY & HOEFER, P.A. HARTMAN CONSULTANTS, LLC

26458

Date	Description	Invoice #	Amount	Disc	Net Amt
12/08/17	CWS I-20 Wastewater System Appraisal Report (Inv Nov)	NOV	4,370.00		4,370.00
Check Date	Check #	Gross Amt	Disc Amt	Net Amt	
12/08/17	26458	4,370.00	0.00	4,370.00	

EXHIBIT C



Fri 5/18/2018 9:09 AM

Robert M. Yanity

RE: Update on Work on Forty Love Sewer System

To:

Good morning Laura. We appreciate you all giving us the opportunity to come and hear everyone's concerns.

As we discussed at the meeting last night, GMC was brought in to not only conduct the six month assessment but to also insure that the fixes to the three houses you mention are being done prudently and with no impact to the overall system. Essentially, they are a second set of eyes to make sure the work will take care of those problems. Our new president, Catherine Heigel, used them when she was at Duke and has a great deal of confidence in their work.

As Lesley mentioned in the meeting, the work on those three homes is the top priority. He has submitted his plan to our president and his management with a goal of completing the work in 30 days. I will make sure I communicate with them and to you every step of the way. And if there are any of your neighbors that are having issues, we want to hear from them.

Feel free to contact me if you have any questions or concerns. Thanks!

Robert Yanity

Communications Coordinator

Carolina Water Service, Inc.

RMYanity@uiwater.com

O: 803-753-1193



Wed 8/20/2018 2:59 PM

Robert M. Yanity

RE: FORTY LOVE POINT SEWER BACKUP

To: [REDACTED]
 Cc: [REDACTED]

Good afternoon everyone. I just wanted to give you a brief update on what has taken place since this weekend. To begin, I want to apologize again on behalf of the company to those who had backup issues on Saturday. I am sorry you had to deal with it yet again, especially on a weekend.

CWS and its contractors met at the Forty Love boat landing on Monday to hash out a plan of action and timeline. The group met for several hours and visited each of your homes. Here are the action items that came from that meeting: 1 - Installation of a rain gauge at Forty Love Point with notification capabilities. 2 - Installation of a pump, and if needed, check valves in the LETTS tank. 3 - Re-routing of effluent piping of the affected homes to sewer lines at higher elevation along the road.

As a reminder, the long-term solution is the construction of a second lift station in the subdivision. This will take approximately 6 to 8 months to complete. The short-term solutions listed above could take 4 to 6 weeks due to the timing to obtain the required pumps and construction. Notwithstanding these short term and long-term work efforts, it is possible you may continue to experience service issues. We are hopeful that the installation of the rain gauges will allow us to dispatch the pump trucks faster and avoid future backups in the interim.

Thank you for your patience as we work through these solutions. Please do not hesitate to contact us at any time. We plan to provide another update at the next HOA meeting.

Robert Yanity
 Community Relations Coordinator
 Carolina Water Service, Inc.
RMYanity@uiwater.com
 O: 803-753-1193



Thu 8/2/2018 10:54 AM

Robert M. Yarity

RE: Please Update on the Forty-Love Point sewer project

To: [REDACTED]

Cc: [REDACTED]

You forwarded this message on 8/12/2018 9:49 AM.

Here is a quick update on the progress of the Forty Love Point Sewer Study and subsequent system improvements.

Regarding the study, GMC has completed the evaluation of the system, along with the recommended short-term and long-term improvements to resolve the current issues. They have provided their report to CWS for review and approval. CWS has authorized them to move forward with the design and installation of the short-term and long-term improvements.

Status on Short-Term Improvements

- The survey of the three (3) affected homes is complete.
- Rain gauges with alarming capabilities have been installed on the south end of the system to provide CWS operators with better notifications of wet weather in the area.
- GMC is currently in the design phase of these improvements.
 - Lesley Joseph visited the Dixons' and the Kings' residences this week to determine the most appropriate layout of the improvements and to get feedback. He plans on visiting the Waggoners' home later this week.
 - GMC has identified the pump that they would like to use for the installations.
 - The drawings for this project are being done right now.
- Meanwhile, CWS has consistently staged a pump truck at the subdivision to respond quickly to weather changes.
- The anticipated completion date for the short-term solution is September 7.

Status of the Long-Term Improvements

- GMC is currently in the preliminary design phase of this project.
 - They are analyzing flow data at the Hiller Rd. Lift Station.
 - They are evaluating the best location for the proposed wet weather pump station.
 - Lesley is investigating the proposed force main route from this station to the Hiller Rd. Lift Station.

I hope this update was helpful. Please feel free to contact me if you have any questions.

Robert Yarity

Community Relations Coordinator

Carolina Water Service, Inc.

RMYarity@uiwater.com

O: 803-753-1193



June 7, 2018

Mr. Brad Kirby
ORS Consumer Services Department
1401 Main Street, Suite 900
Columbia, SC 29201

Re: Response to Forty Love Point Sewer Issue on May 25, 2018

Dear Mr. Kirby;

Please accept this correspondence as Carolina Water Service, Inc.'s (CWS or the Company) response to your email, dated May 31, 2018, requesting a response to the complaint received by your office from Ms. Cathy Dixon who lives at 105 Forty Love Point Dr. in Chapin, SC.

Below is an update on the Company's plans to resolve the collection system issues impacting certain residents, including Ms. Dixon, in the Forty Love Point subdivision. Our engineering firm, Goodwyn Mills Cawood, Inc. (GMC), is working to help CWS address these issues in accordance with the following project schedule:

GMC Action Plan for Forty Love Point Sewer Issues

Phase	Objectives	Associated Tasks	Anticipated Date of Completion
1. Assessment/ Evaluation of Existing System	<ul style="list-style-type: none">Gain a full understanding of the function of the sewer systemDetermine the existence of any deficiencies or areas of improvement	<ul style="list-style-type: none">Review record drawings of existing sewer system layoutReview specifications and detail drawings for all sewer system components (e.g., septic tanks, pumps, cleanouts, etc.)Review maintenance history on the sewer system, as providedConduct site visits (as needed)Perform interviews with Utilities, Inc. staff and operators (as needed)	May 25, 2018 COMPLETED
2. Development of Short-Term Solution	<ul style="list-style-type: none">Resolve the sewer backup issues for the three (3) homes with reported concerns	<ul style="list-style-type: none">Determine the condition and functionality of the septic systems of the three (3) homes with reported sewer issuesEvaluate any challenges or concerns related to performing modifications to	June 8, 2018 ONGOING

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		their existing septic systems and sewer services <ul style="list-style-type: none"> • Provide suggested modifications to their systems to alleviate sewer issues • Meet with Utilities, Inc. to discuss feasibility of proposed modifications and timeline for implementation • Meet with concerned homeowners (if needed) to discuss proposed modifications 	
3. Recommendations for Long-Term Sewer System Improvement	<ul style="list-style-type: none"> • Provide recommendation for long-term improvement to the existing sewer system 	<ul style="list-style-type: none"> • Develop an inspection and maintenance plan to ensure the integrity of all residential sewer system components, including cleanouts, septic systems, etc. • Evaluate the Hiller Rd. pump station operations to determine if upgrades/modifications are needed • Investigate layout of the neighborhood to determine the feasibility of installing additional sewer lines to pump station • Provide recommended improvements to the sewer system to Utilities, Inc. for review and comment 	June 22, 2018 ONGOING

As noted in the outline above, the Company and GMC are working diligently to implement both short and long-term solutions. Currently, the short-term solutions being investigated for the three affected property owners include (but are not limited to):

- Assessing the condition of the existing septic systems (including valves, piping, and solids buildup) at each residence to ensure proper function;
- Placing a small pump in the second chamber of the existing tanks at the affected properties to pump into the main sewer line; and
- Constructing a second tank with a small pump adjacent to the existing septic tank to provide additional storage during rain events.

The Company met with GMC and other contractors on May 31, 2018, to discuss these short-term options and work toward a recommendation which will be selected and implemented later this month. As for a long-term solution, we are currently evaluating the following possible actions:

- Constructing a small pump station with a small force main on the south end of the subdivision near the location where trucks currently extract water during rain events;

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- Intercepting flow from various houses with a small force main network along the road and individual residential pump stations at specific homes; and
- Evaluating the feasibility of a vacuum-type sewer installation in the subdivision.

In response to ORS's request for a log of our contacts with Ms. Dixon over the past 30 days, CWS only has a record of contact with Ms. Dixon on the date of the recent event, May 25th. Immediately upon notification by Ms. Dixon of her sewer backup, Company personnel and pump trucks were dispatched to address the issue. The problem was resolved within an hour of the first notification and the trucks remained in the neighborhood throughout the night as a precaution.

CWS is committed to resolving the collection system issues affecting the Forty Love Point subdivision as soon as possible. In fact, this work is one of our top priorities. While the work to correct the issues is ongoing, the Company will proactively pump and haul water from the system in an effort to avoid further backups in residents' homes. Please see attached for a copy of a letter sent by Ms. Heigel, CWS's President, to Mr. and Mrs. Jay Dixon after the recent rain event on May 25, 2018.

In keeping with our commitment to keep homeowners informed of our progress, the Company and GMC will be meeting with the Forty Love Point Homeowners Association members later this month to provide an update on our remediation efforts. As we work through this process, we are also happy to provide ongoing updates to the ORS.

Please do not hesitate to contact me at 803-753-1193 if you have any further questions.

Sincerely,

A handwritten signature in blue ink that reads "Robert Yanity".

Robert Yanity

Community Relations Coordinator

Encl: Heigel Letter to Ms. Dixon

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